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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

SALOOJAS, INC.,

*Plaintiff,*

v.

BLUE SHIELD OF CALIFORNIA LIFE &  
HEALTH INSURANCE COMPANY

*Defendant.*

Case No.: 3:22-cv-03267-MMC  
Hon. Maxine M. Chesney

**STIPULATION TO SEAL DOCKET 1  
UNDER HIPAA**

**Complaint Filed:** June 3, 2022

Pursuant to Civil Local Rule 6-1(a), Plaintiff Saloojas, Inc (“Saloojas”) and Defendant BLUE SHIELD OF CALIFORNIA LIFE & HEALTH INSURANCE COMPANY (“Blue Shield”) by and through their respective counsel of record, stipulate as follows:

WHEREAS, Plaintiff served its Complaint on June 3, 2022;

WHEREAS, After service it was discovered that the exhibits on pages 20 through 24 of the complaint contained the names and member identification numbers of five patients whose Protected Health Information was required to be redacted pursuant to the Federal HIPAA law. The names had been manually crossed out but on the original complaint before conversion to PDF form for filing

1 WHEREAS after service of the Complaint Defendant discovered that the names could be  
2 read through thru the crossing out and so notified Plaintiff

3 WHEREAS Plaintiff upon being notified that the names and member identification numbers  
4 were readable, immediately filed a Corrected Copy of the Complaint as Docket 14 wherein the  
5 names were whited out along with Member Identification numbers and further corrected was the  
6 reported total number of the pages from 37 to 38 and made no other changes to the Corrected Copy

7 WHEREAS the docketing clerk notified Plaintiff that although the Corrected Copy is filed an  
8 order is still needed to seal DOCKET 1 so that the Protected Health Information protected under  
9 HIPAA cannot be accessed

10 WHEREAS, Plaintiff has requested, and Defendant has consented to stipulate, in lieu of  
11 making a motion to seal to Docket 1, that Docket 1 can be sealed

12 **NOW, THEREFORE, IT IS HEREBY STIPULATED** pursuant to Civil Local Rule 6-  
13 1(a), by and between the Parties, through their respective counsel, that Docket 1 filed in the action  
14 can be sealed

15 **IT IS SO STIPULATED.**

16  
17 DATED: July 18, 2022

**MANATT, PHELPS & PHILLIPS, LLP**

18  
19 By: /s/ Justin Jones Rodriguez  
JUSTIN JONES RODRIGUEZ

20  
21 DATED: July 18, 2022

**LAW OFFICE OF MICHAEL LYNN  
GABRIEL**

22  
23 By: /s/ Michael Lynn Gabriel  
MICHAEL LYNN GABRIEL  
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**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_, 2022

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)**

Pursuant to Civil Local Rule 5-1(h)(3), the filer of this document attests that concurrence in the filing of this document has been obtained from the signatories above.

DATED: July 18, 2022

/s/ MICHAEL LYNN GABRIEL  
MICHAEL LYNN GABRIEL

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